

Exhibit 6

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE SOUTHERN DISTRICT OF NEW YORK
4 Civil No.: 19 Civ. 08655 (LGS) (GWG)

5 -----x
6 ULKU ROWE,

7 Plaintiff,

8
9 - against -
10

11 GOOGLE LLC,

12 Defendant.
13 -----x

14 October 14, 2020

15 9:39 a.m.

16 Videotaped Deposition of ULKU ROWE,
17 taken by Defendant, pursuant to Notice,
18 held via Google Hangouts videoconference,
19 before Todd DeSimone, a Registered
20 Professional Reporter and Notary Public of
21 the States of New York and New Jersey.
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A P P E A R A N C E S :

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ALSO PRESENT:

PETER COOPER, ESQ., Google

SHAWN BUDD, Videographer

1 U. ROWE

2 Google?

3 A. I have not.

4 Q. Have you ever been through the
5 leveling process at Google, as a
6 participant in the process of leveling
7 someone?

8 A. I have not.

9 Q. Have you ever participated in a
10 hiring committee?

11 A. I have not.

12 Q. Have you ever participated in
13 any way in the decision-making process that
14 leads to the leveling of someone at hire at
15 Google?

16 A. I have done a lot of
17 interviews, but no, I have not specifically
18 been involved in leveling discussions, no.

19 Q. And in any of those interviews,
20 were you asked to offer an opinion as to
21 the level that someone was supposed to --
22 that someone might get?

23 A. I have not.

24 Q. You indicated earlier in your
25 testimony that there was another

1 U. ROWE

2 opportunity, VP, financial services and
3 sales, that you applied for in 2020. Do
4 you recall that testimony?

5 A. I raised my hand for it.

6 Q. What do you mean when you say
7 you raised your hand for it?

8 A. I expressed interest in it.

9 Q. And how did you express
10 interest in it?

11 A. I heard from Kristen, and I'm
12 completely blanking on her last name,
13 Kristen runs sales for U.S., and I had -- I
14 had a one-on-one with her, and she
15 mentioned that she was thinking of hiring a
16 VP of sales for financial services, and I
17 told her that I would be interested.

18 Q. And what, if anything, happened
19 next in connection with your interest in
20 that job?

21 A. So she asked me to reach out to
22 HR, so I reached out to HR.

23 Q. Who did you reach out to in HR?

24 A. I think it was Stuart Weidman,
25 I'm not 100 percent sure.

1 U. ROWE

2 Q. What happened next?

3 A. He said that he would talk to
4 Kristen and come back to me.

5 Q. And did he?

6 A. He did.

7 Q. And what happened next?

8 A. He said that based on the
9 conversations with Kristen, that they
10 weren't going to go ahead with me.

11 Q. Did he tell you anything more,
12 did he give you any more details?

13 A. I don't remember a lot of the
14 details, but I was surprised when he said
15 based on your interview with Kristen, I did
16 not have an interview with Kristen, this
17 was like a casual one-on-one get-together,
18 I found out about the opportunity during
19 that meeting, and that, you know, he told
20 me that based on that conversation that I
21 was being discounted, I was surprised.

22 Q. And was that the end of it?

23 A. Yes.

24 Q. Did you ever follow up with
25 Kristen?

1
2 CERTIFICATION
34 I, TODD DeSIMONE, a Notary Public for
5 and within the State of New York, do hereby
6 certify:7 That the witness whose testimony as
8 herein set forth, was duly sworn by me; and
9 that the within transcript is a true record
10 of the testimony given by said witness.11 I further certify that I am not related
12 to any of the parties to this action by
13 blood or marriage, and that I am in no way
14 interested in the outcome of this matter.15 IN WITNESS WHEREOF, I have hereunto set
16 my hand this 26th day of October, 2020.
1718 19 TODD DESIMONE
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ERRATA SHEET
VERITEXT LEGAL SOLUTIONS

CASE NAME: ROWE v. GOOGLE
DATE OF DEPOSITION: 10/14/20
WITNESS' NAME: ULKU ROWE

PAGE/LINE(S) /CHANGE/REASON

121:8 /change "lock" to "look"/spelling
250:20/change "are" to "were"/correction
254:9/delete "on"/ correction
261:22/change "plus" to "plug"/spelling
264:4/change "were" to "they were"/ correction
286:14/change "was" to "were"/correction
286:22/change "8's" to "8s"/spelling
290:24/change "Weidman" to "Vardaman"/
correction
294:19/change "was" to "were"/correction

11/30/2020

Date

DocuSigned by:

Ulku Rowe

Ulku Rowe

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